BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

OBJECTION OF UNITED STATES POSTAL SERVICE TO INTERROGATORY OF VAL-PAK DIRECT MARKETING SYSTEMS, INC., VAL-PAK DEALERS'
ASSOCIATION, INC., AND CAROL WRIGHT PROMOTIONS, INC. (VP-CW/USPS—2)

On May 19, Val-Pak Direct Marketing Systems, Inc., Val-Pak Dealers'
Association, Inc., and Carol Wright Promotions filed interrogatory VP-CW/USPS—2.
The interrogatory is styled as follow-up discovery to VP-CW/USPS-1, which was filed on May 4, 2000. The Postal Service objected to VP-CW/USPS –1 on grounds of timeliness, but nevertheless offered to provide a response in the spirit of cooperation.

The Postal Service accordingly objects to interrogatory VP-CW/USPS—2 on grounds that it is untimely filed under the procedural schedule in P.O. Ruling No. R2000-1/4 and under Rule 25(a) of the Commission's Rules of Practice and Procedure. Nevertheless, the Postal Service currently plans to supply a response on or before the due date. By offering to supply a response, the Postal Service does not intend to waive its right to object to follow-up or related discovery on the subject matter of interrogatory VP-CW/USPS—2.

Respectfully submitted,

UNITED STATES POSTAL SERVICE By its attorneys: Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

Anthony Alverno

Attorney

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Anthony Alvernó

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